

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	§	Group Art Unit: 2164
James L. Platt, <i>et al.</i>	§	
	§	Examiner: Mahmood, Rezwanul
Serial No.: 10/612,701	§	
	§	Atty Docket No.: AUS920030396US1
Filed: 07/02/2003	§	
	§	Customer No.: 34533
Title: Populating A Database Using	§	
Inferred Dependencies	§	Confirmation No.: 5875

Mail Stop: Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

APPEAL BRIEF

Honorable Commissioner:

This is an Appeal Brief filed pursuant to 37 CFR § 41.37 in response to the Office Action of May 18, 2007 (hereinafter the “Office Action”), and pursuant to the Notice of Appeal filed August 17, 2007.

REAL PARTY IN INTEREST

The real party in interest in accordance with 37 CFR § 41.37(c)(1)(i) is the patent assignee, International Business Machines Corporation (“IBM”), a New York corporation having a place of business at Armonk, New York 10504.

RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences within the meaning of 37 CFR §41.37(c)(1)(ii).

STATUS OF CLAIMS

Status of claims in accordance with 37 CFR § 41.37(c)(1)(iii): Eighteen (18) claims are filed in the original application in this case. Claims 1-18 are rejected in the Office Action. Claims 1-18 are on appeal.

STATUS OF AMENDMENTS

Status of amendments in accordance with 37 CFR § 41.37(c)(1)(iv): No amendments were submitted after final rejection. The claims as currently presented are included in the Appendix of Claims that accompanies this Appeal Brief.

SUMMARY OF CLAIMED SUBJECT MATTER

Appellants provide the following concise summary of the claimed subject matter according to 37 CFR § 41.37(c)(1)(v). This summary includes a concise explanation of the subject matter defined in each of the independent claims involved in the appeal and includes references to the specification by page and line number and to the drawings by reference characters. The three independent claims involved in this appeal are claims 1, 7, and 13. Claim 1 is a method claim. Claims 7 and 13 recite counterpart aspects of the method of claim 1. Claim 7 recites system aspects of the method of claim 1, and claim 13 recites computer program product aspects of the method of claim 1.

Claim 1 recites a method for populating a database (page 12, lines 17-18). The method of claim 1 includes providing a database having a schema (page 12, line 20; Figure 3, reference characters 302, 308, and 310). The method of claim 1 also includes inferring

from the schema dependencies among a fact table and related dimension tables (page 13, lines 3-4; Figure 3, reference characters 304, 310, 316, 312, and 314). The method of claim 1 also includes inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables (page 24, line 27 – page 25, line 2; Figure 3, reference characters 306, 316, 312, 318, and 314).

Claim 7 recites a system for populating a database (page 12, lines 17-18). The system of claim 7 includes means for providing a database having a schema (page 12, line 20; Figure 3, reference characters 302, 308, and 310). The system of claim 7 includes means for inferring from the schema dependencies among a fact table and related dimension tables (page 13, lines 3-4; Figure 3, reference characters 304, 310, 316, 312, and 314). The system of claim 7 also includes means for inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables (page 24, line 27 – page 25, line 2; Figure 3, reference characters 306, 316, 312, 318, and 314). The means for carrying out the acts described in claim 7 include computer systems described at page 7, lines 5-17, in the original specification.

Claim 13 recites a computer program product for populating a database (page 12, lines 17-18). The computer program product of claim 13 includes a recording medium (page 7, line 17 - page 8 line 3). The computer program product of claim 13 also includes means, recorded on the recording medium, for providing a database having a schema (page 12, line 20; Figure 3, reference characters 302, 308, and 310). The computer program product of claim 13 also includes means, recorded on the recording medium, for inferring from the schema dependencies among a fact table and related dimension tables (page 13, lines 3-4; Figure 3, reference characters 304, 310, 316, 312, and 314). The computer program product of claim 13 also includes means, recorded on the recording medium, for inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables (page 24, line 27 – page 25, line 2; Figure 3, reference characters 306, 316, 312, 318, and 314).

GROUND S OF REJECTION

In accordance with 37 CFR § 41.37(c)(1)(vi), Appellants provide the following concise statement for each ground of rejection:

1. Claims 1, 7, and 13 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Weissman, *et al.* (U.S. Patent No. 6,212,524).
2. Claims 2, 8, and 14 stand rejected for obviousness under 35 U.S.C. § 103(a) as being unpatentable over Weissman, *et al.* (U.S. Patent No. 6,212,524), in view of Veronese, *et al.* (U.S. Publication No. 2004/0210445).
3. Claims 3-6, 9-12, and 15-18 stand rejected for obviousness under 35 U.S.C. § 103(a) as being unpatentable over Weissman, *et al.* (U.S. Patent No. 6,212,524), in view of Veronese, *et al.* (U.S. Publication No. 2004/0210445) and further in view of Medicke, *et al.* (U.S. Publication No. 2004/0236786).

ARGUMENT

Appellants present the following arguments pursuant to 37 CFR § 41.37(c)(1)(vii) regarding the three grounds of rejection in the present case.

Argument Regarding The First Ground Of Rejection On Appeal: Claims 1, 7, and 13 Stand Rejected Under 35 U.S.C. § 102(b) As Being Anticipated By Weissman

Claims 1, 7, and 13 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Weissman, *et al.* (U.S. Patent No. 6,212,524) (hereafter ‘Weissman’). To anticipate claims 1, 7, and 13 under 35 U.S.C. § 102(b), two basic requirements must be met. The first requirement of anticipation is that Weissman must disclose each and every element as set forth in Appellants’ claims. The second requirement of anticipation is that Weissman must enable Appellants’ claims. As explained in more detail below, Weissman

does not disclose each and every element of independent claims 1, 7, and 13. Weissman therefore cannot be said to anticipate the claims of the present application within the meaning of 35 U.S.C. § 102(b). Appellants respectfully traverse each rejection individually below and request reconsideration of claims 1, 7, and 13.

**Weissman Does Not Disclose Each and Every Element
Of The Claims Of The Present Application**

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As explained in more detail below, Weissman does not disclose each and every element of claim 1, and Weissman therefore cannot be said to anticipate the claims of the present application within the meaning of 35 U.S.C. 102(b).

Independent claim 1 recites:

1. A method for populating a database, the method comprising:

providing a database having a schema;

inferring from the schema dependencies among a fact table and related dimension tables; and

inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables.

**Weissman Does Not Disclose
Inferring From The Schema Dependencies Among
A Fact Table And Related Dimension Tables**

The Office Action takes the position that Weissman at column 3, lines 1-2; column 3, lines 36-38; column 5, lines 36-32; column 7, lines 42-49; and column 10, lines 24-42

discloses the second element of claim 1: inferring from the schema dependencies among a fact table and related dimension tables. Appellants respectfully note in response, however, that what Weissman at column 3, lines 1-2, in fact discloses is “[t]he schema defines the relationships between the tables and columns.” What Weissman at column 3, lines 36-38, in fact discloses is:

In some embodiments, the schema is a star schema having one or more fact tables and one or more dimension tables (or dimensions). The schema can be held in a constellation that includes additional information. The constellation can correspond to a business process.

What Weissman at column 5, lines 26-32, in fact discloses is:

Focusing on the datamart creation, the system allows a consultant to build a datamart from a schema definition of the sources of the data. From the schema definition the system automatically builds the table needed in the datamart. Also, from the schema definition, and the sources definition, the system can automatically extract the data from those sources.

What Weissman at column 7, lines 42-49, in fact discloses is:

What is important is that the consultant can easily define a schema for the datamart 150 and that definition is kept in the schema definitions 161. From the schema definitions 161, not only can the tables in the datamart 150 be generated, but also the automatic extraction and conversion of the data from the source system 110 can be performed, aggregates are set up, and a query mechanism is generated.

And what Weissman at column 10, lines 24-42, in fact discloses is:

At block 210, a consultant uses the enterprise manager 102 to define the schema. The schema is defined using the metadata 160. This process is illustrated in greater detail in FIG. 7 through FIG. 35. Generally, defining the schema involves determining the business processes of the organization for which the system 100 is being implemented. The consultant then defines the star schema for those business processes. The star schema has a fact table and a number of dimensions. The consultant also defines from where the data in the schema is to be derived. That is, the consultant defines from which fields and tables the information is to be

extracted from the source systems 110. The consultant also defines how that data is to be put into the datamart 150. That is, the consultant associates each piece of data with a semantic meaning. This semantic meaning defines how the data from the source system is to be manipulated and how it is to populate the datamart 150. At this point, the consultant can also define the aggregates that can be used in the datamart 150.

That is, Weissman at column 3, lines 1-2; column 3, lines 36-38; column 5, lines 26-32; column 7, lines 42-49; and column 10, lines 24-42, discloses a star schema with fact tables and dimension tables, building a datamart from a schema definition of the sources of the data, and a schema definition process that includes determining business processes, defining star schema, defining sources of data, and so on. Weissman's star schema, building a datamart from a schema definition of the sources of data, and schema definition process does not disclose inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application. Weissman, neither at these reference points nor anywhere else in Weissman, makes any mention of inferring from the schema dependencies among a fact table and related dimension tables. Weissman's schema definition process does make mention of "a fact table and a number of dimension tables," but Weissman never discloses inferring dependencies among a fact table and related dimension tables. The mere existence of fact tables and dimension tables definitely is not enough to disclose any particular use of such tables, and the use claimed here, inferring dependencies and inserting data according to inferred dependencies, is a novel use which cannot at all be said to be disclosed by Weissman. Because Weissman does not disclose each and every element and limitation of Appellants' claims, Weissman does not anticipate Appellants' claims, and the rejections under 35 U.S.C. § 102(b) should be withdrawn.

**Weissman Does Not Disclose Inserting
Rows Of Data Into The Tables In
Accordance With The Dependencies**

The Office Action takes the position that Weissman at column 3, lines 1-11, and column 10, lines 24-42, discloses the third element of claim 1: inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables.

Appellants respectfully note in response, however, that what Weissman at column 3, lines 1-11, in fact discloses is:

The schema defines the relationships between the tables and columns. The description further defines how data is to be manipulated and used to populate the tables in the datamart. That is, the description defines the semantic meaning of the data. The description is further used to create a set of commands to create the tables. The commands are executed causing the creation of the tables. Importantly, when the semantic meaning is associated with the column and rows, programs for manipulating and propagating data into those columns and rows are automatically defined.

And what Weissman at column 10, lines 24-42 discloses is:

At block 210, a consultant uses the enterprise manager 102 to define the schema. The schema is defined using the metadata 160. This process is illustrated in greater detail in FIG. 7 through FIG. 35. Generally, defining the schema involves determining the business processes of the organization for which the system 100 is being implemented. The consultant then defines the star schema for those business processes. The star schema has a fact table and a number of dimensions. The consultant also defines from where the data in the schema is to be derived. That is, the consultant defines from which fields and tables the information is to be extracted from the source systems 110. The consultant also defines how that data is to be put into the datamart 150. That is, the consultant associates each piece of data with a semantic meaning. This semantic meaning defines how the data from the source system is to be manipulated and how it is to populate the datamart 150. At this point, the consultant can also define the aggregates that can be used in the datamart 150.

That is, Weissman at column 3, lines 1-11, and column 10, lines 24-42, discloses a schema that defines the relationships between the tables and columns and a consultant that defines from where the data in the schema is to be derived. Weissman's schema that defines the relationships between the tables and columns and a consultant that defines from where the data in the schema is to be derived does not disclose inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables as claimed in the present application. Inserting rows of data into the fact table and dimension tables is carried out in accordance with the inferred dependencies. As mentioned above, Weissman does not disclose inferring from a schema

dependencies among a fact table and related dimension tables. Weissman instead discloses only that a schema defines the relationships between tables and columns. Weissman does not disclose, however, or even mention, inferring from a schema dependencies among a fact table and related dimension tables. That is, Weissman does not disclose inferred dependencies as claimed in the present application. Because Weissman does not disclose inferred dependencies as claimed here, Weissman cannot be said to disclose inserting, in accordance with such dependencies, rows of data into the fact table and rows of data into the dimension tables as claimed in the present application. Because Weissman does not disclose each and every element and limitation of Appellants' claims, Weissman does not anticipate Appellants' claims, and the rejections under 35 U.S.C. § 102(e) should be withdrawn.

Relations Among Claims

Independent claim 1 claims method aspects of populating a database according to embodiments of the present invention. Independent claims 7 and 13 respectively claim system and computer program product aspects of populating a database according to embodiments of the present application. For the same reason that Weissman does not disclose or enable a method for populating a database, therefore, Weissman also does not disclose or enable either a system or a computer program product for populating a database corresponding to independent claims 7 and 13. Independent claims 7 and 13 are therefore patentable and should be allowed.

Claims 2-6, 8-12, and 14-18 depend respectively from independent claims 1, 7, and 13. Each dependent claim includes all of the limitations of the independent claim from which it depends. Because Weissman does not disclose or enable each and every element of the independent claims, Weissman also does not disclose or enable each and every element of the dependent claims of the present application. As such, claims 2-6, 8-12, and 14-18 are also patentable and should be allowed.

**Argument Regarding The Second Ground Of Rejection On Appeal:
Claims 2, 8, And 14 Stand Rejected Under 35 U.S.C. § 103(a)
As Being Unpatentable Over Weissman In View Of Veronese**

Claims 2, 8, and 14 stand rejected for obviousness under 35 U.S.C. § 103(a) as being unpatentable over Weissman in view of Veronese, *et al.* (U.S. Publication No. 2004/0210445) (hereafter ‘Veronese’). The question of whether Appellants’ claims are obvious *vel non* is examined in light of: (1) the scope and content of the prior art; (2) the differences between the claimed invention and the prior art; (3) the level of ordinary skill in the art; and (4) any relevant secondary considerations, including commercial success, long felt but unsolved needs, and failure of others. *KSR Int’l Co. v. Teleflex Inc.*, No. 04-1350, slip op. at 2 (U.S. April 30, 2007). Although Appellants recognize that such an inquiry is an expansive and flexible one, the Office Action must nevertheless demonstrate a *prima facie* case of obviousness to reject Appellants’ claims for obviousness under 35 U.S.C. § 103(a). *In re Khan*, 441 F.3d 977, 985-86 (Fed. Cir. 2006). To establish a *prima facie* case of obviousness, the proposed combination of the references must teach or suggest all of Appellants’ claim limitations. *Manual of Patent Examining Procedure* § 2142 (citing *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974)). Dependent claims 2, 8, and 14 depend from independent claims 1, 7, and 13, and include all the limitations of the independent claims from which they depend. In rejecting dependent claims 2, 8, and 14, the Office Action relies on Weissman as disclosing each and every element of independent claims 1, 7, and 13. As Appellants have demonstrated above, Weissman in fact does not disclose each and every element of independent claims 1, 7, and 13. Because the proposed combination of Weissman and Veronese relies on the argument that Weissman discloses each and every element of claims 1, 7, and 13, and because Weissman in fact does not disclose each and every element of claims 1, 7, and 13, the proposed combination of Weissman and Veronese cannot teach or suggest all the claim limitations of dependent claims 2, 8, and 14. The proposed combination of Weissman and Veronese, therefore, cannot establish a *prima facie* case of obviousness, and the rejections should be withdrawn.

Argument Regarding The Third Ground Of Rejection On Appeal:
Claims 3-6, 9-12, And 15-18 Stand Rejected Under 35 U.S.C.
§ 103(a) As Being Unpatentable Over Weissman In View
Of Veronese And Further In View Of Medicke

Claims 3-6, 9-12, and 15-18 stand rejected for obviousness under 35 U.S.C. § 103(a) as being unpatentable over Weissman in view of Veronese and further in view of Medicke, *et al.* (U.S. Patent App. Pub. No. 2004/0236786) (hereafter ‘Medicke’). The question of whether Appellants’ claims are obvious *vel non* is examined in light of: (1) the scope and content of the prior art; (2) the differences between the claimed invention and the prior art; (3) the level of ordinary skill in the art; and (4) any relevant secondary considerations, including commercial success, long felt but unsolved needs, and failure of others. *KSR Int’l Co. v. Teleflex Inc.*, No. 04-1350, slip op. at 2 (U.S. April 30, 2007). Although Appellants recognize that such an inquiry is an expansive and flexible one, the Office Action must nevertheless demonstrate a *prima facie* case of obviousness to reject Appellants’ claims for obviousness under 35 U.S.C. § 103(a). *In re Khan*, 441 F.3d 977, 985-86 (Fed. Cir. 2006). To establish a *prima facie* case of obviousness, the proposed combination of the references must teach or suggest all of Appellants’ claim limitations. *Manual of Patent Examining Procedure* § 2142 (citing *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974)). Dependent claims 3-6, 9-12, and 15-18 depend respectively from independent claims 1, 7, and 13, and include all the limitations of the independent claims from which they depend. In rejecting dependent claims 3-6, 9-12, and 15-18, the Office Action relies on Weissman as disclosing each and every element of independent claims 1, 7, and 13. As Appellants have demonstrated above, Weissman in fact does not disclose each and every element of independent claims 1, 7, and 13. Because the proposed combination of Weissman, Veronese, and Medicke relies on the argument that Weissman discloses each and every element of claims 1, 7, and 13, and because Weissman in fact does not disclose each and every element of claims 1, 7, and 13, the proposed combination of Weissman, Veronese, and Medicke cannot teach or suggest all the claim limitations of dependent claims 3-6, 9-12, and 15-18. The proposed combination of Weissman, Veronese, and Medicke, therefore, cannot establish a *prima facie* case of obviousness, and the rejections should be withdrawn.

Conclusion of Appellants' Arguments

Claims 1, 7, and 13 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Weissman. Weissman does not disclose each and every element of Appellants' claims, and Weissman therefore does not anticipate Appellants' claims within the meaning of 35 U.S.C. § 102(b). Claims 1, 7, and 13 are therefore patentable and should be allowed. Appellants respectfully request reconsideration of claims 1, 7, and 13.

Claims 2, 8, and 14 stand rejected for obviousness under 35 U.S.C. § 103(a) as being unpatentable over Weissman in view of Veronese. The combination of Weissman and Veronese does not teach or suggest each and every element of Appellants' claims. Claims 2, 8, and 14 are therefore patentable and should be allowed. Appellants respectfully request reconsideration of claims 2, 8, and 14.

Claims 3-6, 9-12, and 15-18 stand rejected for obviousness under 35 U.S.C. § 103(a) as being unpatentable over the combination of Weissman, Veronese, and Medicke. The combination of Weissman, Veronese, and Medicke does not teach or suggest each and every element of Appellants' claims. Claims 3-6, 9-12, and 15-18 are therefore patentable and should be allowed. Appellants respectfully request reconsideration of claims 3-6, 9-12, and 15-18.

In view of the forgoing arguments, reversal on all grounds of rejection is requested.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Date: October 15, 2007

Respectfully submitted,

By:


John Biggers

Reg. No. 44,537
Biggers & Ohanian, LLP
P.O. Box 1469
Austin, Texas 78767-1469
Tel. (512) 472-9881
Fax (512) 472-9887
ATTORNEY FOR APPELLANTS

**APPENDIX OF CLAIMS
ON APPEAL IN PATENT APPLICATION OF
JAMES LEONARD PLATT, *ET AL.*, SERIAL NO. 10/612,701**

CLAIMS

What is claimed is:

1. A method for populating a database, the method comprising:

providing a database having a schema;

inferring from the schema dependencies among a fact table and related dimension tables; and

inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables.
2. The method of claim 1 wherein inferring dependencies further comprises:

selecting from metadata describing a schema for the database expressions of dependencies; and

inserting the expressions of dependencies into a dependency list.
3. The method of claim 1 wherein inserting rows of data further comprises:

determining whether related dimension data exists for each foreign key in each row of data inserted into the fact table; and

for each foreign key for which related dimension data does not exist, inserting a row of dimension data into a dimension table related to the fact table through the foreign key.

4. The method of claim 1 wherein inserting rows of data further comprises:

determining whether related dimension data exists for each foreign key in each row of data inserted into a first dimension table; and

for each foreign key for which related dimension data does not exist, inserting a row of dimension data into a second dimension table related to the first dimension table through the foreign key.

5. The method of claim 1 wherein inserting rows of data further comprises:

reading the rows of data from a first database, the first database comprising dependencies among tables in the database; and

inserting rows of data into a second database, the second database comprising at least the same dependencies as in the first database.

6. The method of claim 1 wherein a dependency comprises a rule for the database, enforced by a database management system, that a first record in a first table must exist in the database before a second record in a second table may be inserted in the database.

7. A system for populating a database, the system comprising:

means for providing a database having a schema;

means for inferring from the schema dependencies among a fact table and related dimension tables; and

means for inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables.

8. The system of claim 7 wherein means for inferring dependencies further comprises:

means for selecting from metadata describing a schema for the database expressions of dependencies; and

means for inserting the expressions of dependencies into a dependency list.

9. The system of claim 7 wherein means for inserting rows of data further comprises:

means for determining whether related dimension data exists for each foreign key in each row of data inserted into the fact table; and

for each foreign key for which related dimension data does not exist, means for inserting a row of dimension data into a dimension table related to the fact table through the foreign key.

10. The system of claim 7 wherein means for inserting rows of data further comprises:

means for determining whether related dimension data exists for each foreign key in each row of data inserted into a first dimension table; and

for each foreign key for which related dimension data does not exist, means for inserting a row of dimension data into a second dimension table related to the first dimension table through the foreign key.

11. The system of claim 7 wherein means for inserting rows of data further comprises:

means for reading the rows of data from a first database, the first database comprising dependencies among tables in the database; and

means for inserting rows of data into a second database, the second database comprising at least the same dependencies as in the first database.

12. The system of claim 7 wherein a dependency comprises a rule for the database, enforced by a database management system, that a first record in a first table must exist in the database before a second record in a second table may be inserted in the database.

13. A computer program product for populating a database, the computer program product comprising:

a recording medium;

means, recorded on the recording medium, for providing a database having a schema;

means, recorded on the recording medium, for inferring from the schema dependencies among a fact table and related dimension tables; and

means, recorded on the recording medium, for inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables.

14. The computer program product of claim 13 wherein means for inferring dependencies further comprises:

means, recorded on the recording medium, for selecting from metadata describing a schema for the database expressions of dependencies; and

means, recorded on the recording medium, for inserting the expressions of dependencies into a dependency list.

15. The computer program product of claim 13 wherein means for inserting rows of data further comprises:

means, recorded on the recording medium, for determining whether related dimension data exists for each foreign key in each row of data inserted into the fact table; and

for each foreign key for which related dimension data does not exist, means, recorded on the recording medium, for inserting a row of dimension data into a dimension table related to the fact table through the foreign key.

16. The computer program product of claim 13 wherein means for inserting rows of data further comprises:

means, recorded on the recording medium, for determining whether related dimension data exists for each foreign key in each row of data inserted into a first dimension table; and

for each foreign key for which related dimension data does not exist, means, recorded on the recording medium, for inserting a row of dimension data into a second dimension table related to the first dimension table through the foreign key.

17. The computer program product of claim 13 wherein means for inserting rows of data further comprises:

means, recorded on the recording medium, for reading the rows of data from a first database, the first database comprising dependencies among tables in the database; and

means, recorded on the recording medium, for inserting rows of data into a second database, the second database comprising at least the same dependencies as in the first database.

18. The computer program product of claim 13 wherein a dependency comprises a rule for the database, enforced by a database management system, that a first record in a first table must exist in the database before a second record in a second table may be inserted in the database.

**APPENDIX OF EVIDENCE
ON APPEAL IN PATENT APPLICATION OF
JAMES LEONARD PLATT, *ET AL.*, SERIAL NO. 10/612,701**

This is an evidence appendix in accordance with 37 CFR § 41.37(c)(1)(ix).

There is in this case no evidence submitted pursuant to 37 CFR §§ 1.130, 1.131, or 1.132, nor is there in this case any other evidence entered by the examiner and relied upon by the appellants.

RELATED PROCEEDINGS APPENDIX

This is a related proceedings appendix in accordance with 37 CFR § 41.37(c)(1)(x).
There are no decisions rendered by a court or the Board in any proceeding identified pursuant to 37 CFR § 41.37(c)(1)(ii).